

Compliance Assessment Report CAR_NRW0040276

Permit being assessed: BU2489IT.

For: Baglan Paper Mill, held by Sofidel UK Limited

At: Brunel Way , Baglan Energy Park, Neath, Neath Port Talbot, SA11 2FP.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 28/07/2022 between 10:30 and 15:00.

Parts of permit assessed: Monitoring / Operations

NRW Lead Officer: Lee Mills, accompanied by Rebecca Williams.

Report sent to: Kerry Mackinnon, Environment Manager on 17/08/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E3 - Emissions - Surface water	C3 Minor	3.1.2 The limits given in schedule 3 shall not be exceeded
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
E3	Operator has liaised with manufacturer of equipment and	Already

Criteria	Action needed	Complete by
	reset signal. New end cap installed on probe as well as being repositioned. offtake Bioreactor area cleaned, increased sludge wasted and Sofidel have invested in spare DO probe.	completed

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Attendees

Kerry Mackinnon - Environment Manager, Sofidel

Joanna Crook – Trainee Environment Assistant, Sofidel

Andrea Gandolfi – Papermill Production Manager, Sofidel

Mathew Cove – Converting Production Manager, Sofidel

Rebecca Williams – Lead Specialist Permitting Officer, NRW

Lee Mills – Senior Officer, NRW

Introduction

This Compliance Assessment Report (CAR) was undertaken following a site visit undertaken by Lee Mills and Rebecca Williams on 28th July 2022. Following staff changes to the SW Wales Industry Regulation Team Lee Mills has recently been assigned Sofidel as Site Inspector. The focus of the visit therefore was for NRW officers to meet key personnel at Sofidel and gain an understanding of site operations. An agenda was shared with the Operator prior to the site visit that consisted of the following items –

- Introductions
- Site induction
- Site visit / process overview
- Lunch
- Update on BOD breaches
- Future site changes / update on ViscoNip Project
- AOB
- Close

Site visit / process overview

Following introductions and a PPE site safety discussion NRW officers were introduced to Andrea Gandolfi (Papermill Production Manager). Mr Gandolfi had been assigned to escort the officers and provide an expert overview of the Papermill area starting with the reception area that held the baled raw material (cellulose).

The process continued with the bales being placed onto a conveyor that were transported to a pulper where the cellulose is mixed with water with the solution refined through rotating blades. The water removed during the drying process is recycled via the site’s wastewater treatment plant. NRW Officers were also invited into the control room where the remaining papermill processes were described including how the new ViscoNip Project technology would fit into operations on site.

The Officers were taken outside of the papermill to view the location of the permitted point source emissions to air. Kerry Mackinnon discussed the location of a proposed new water vapour only emission point (ViscoNip Project) and sought advice in relation to potential future requirements under the Medium Combustion Plant Directive (MCPD) for the site’s standalone gas fired boiler.

Kerry Mackinnon escorted the Officers to Sofidel’s waste storage area and answered questions waste labelling, handling, hazardous waste procedures and provided information on the company’s waste removal contractors and the checks in place to ensure compliance. The effluent treatment plant operation was explained with the first step of that being process water being absorbed from the mill into the equalisation tank. The effluent is then pumped to a bioreactor that is full of bacteria that neutralises any contaminants with any remaining sludge sent to a centrifuge prior to be spread on land. The treated effluent is finally discharged into a Welsh Water outfall and then via a series of diffusers into Swansea Bay.

The process overview was finalised with Mathew Cove (Converting Production Manager) taking the group through the steps of the site’s activities in the Converting area. Large rolls are unwound, laid into plies, embossed, laminated with glue, and finally printed.

Update on BOD breaches

Kerry Mackinnon has recently notified NRW of breaches to permitted limits on Biological Oxygen Demand (BOD) that relate to the final discharge from on-site biological effluent treatment plant. The emission limit value states –

W1 [SS 72540 91890]	Biological Oxygen Demand (BOD)	On-site biological effluent treatment plant	25mg/l	24-hour flow proportional composite sample	Weekly	MCERTS - Performance Standards and Test Procedures for Continuous Water Monitoring Equipment
---------------------	--------------------------------	---	--------	--	--------	--

The following breaches were notified to NRW via Schedule 5 Part A form submissions as stated in permit condition 4.3.1 (b) –

- 04th May 2022 - limit 25mg/l – BOD lab result 29mg /l
- 11th May 2022 - limit 25mg/l – BOD lab result 59mg/l
- 26th May 2022 - limit 25mg/l – BOD lab result 34mg/l

Following investigations by the Operator a Schedule 5 Part B was submitted to NRW –

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	<p>The issue appears to be that the control panel was showing a false reading which lead us to believe that the oxygen level was ok. There had been a loss of signal between the probe and the DCS and the reading was not changing. Contacted the manufacturer who advised us to reset the signal which enable a correct reading to be displayed.</p> <p>Additional actions included:</p> <ul style="list-style-type: none"> • install new end cap on probe • repositioning of the probe • cleaned bioreactor off take area • increased sludge wastage • invest in a spare DO probe <p>This appears to have resolved the issue as the result since completing the actions have been in back in spec.</p>

Compliance:

The above is considered a breach of condition 3.1.2. A score of C3 has been allocated.

Future site changes / update on VISCONIP Project

Sofidel submitted a normal permit variation application to NRW on 1st June 2022. The variation is required for the installation of an additional emission point (A7) as part of our ViscoNip energy efficiency project. The project aims to save approximately 3,400 tonnes of CO2 per year through the improved drying of the paper. The Operator explained the challenging timelines associated with the project and asked NRW Officers if determination of the variation would be completed by October 2022. This date would align with a planned shutdown that would enable construction works relating to the project. NRW advised that it was not possible to predetermine any application received but would note the request with colleagues in the Permitting Team.

AOB

The Operator discussed the monitoring frequency of the BOD ELV and asked if that could be changed to once a month instead of weekly as stated in Sofidel’s permit. NRW advised shortly after this site visit on 1st August 2022 that this weekly monitoring requirement is set out in the relevant BREF and there is no opportunity for NRW to set a different monitoring frequency for BOD.

Kerry Mackinnon queried if NRW had reviewed Sofidel’s annual performance report required by permit condition 4.2.2. Lee Mills advised he would assess and provide feedback to Sofidel.

Compliance: Sofidel’s annual report required under permit condition 4.2.2 was received by NRW on 28th January 2022. The report has been assessed with NRW confirming that the monitoring data submitted demonstrates that Sofidel are compliant.

Action: NRW to assess annual report and provide feedback (completed).

Conclusion

The site appeared to be well managed and the housekeeping was excellent. The main objective of the visit was for the new inspector to gain an understanding of site operations and establish links with the site management.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.